- 1			
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16	UNITED STATES	DISTRICT COU	RT
17	CENTRAL DISTRIC	CT OF CALIFOR	RNIA
18	WESTERN	DIVISION	
19	ROBERT HUNTER BIDEN, an	Case No. 2:23-c	v-09430-SVW-PD
20	individual, Plaintiff,	AMENDED JO EXHIBIT LIST	INT TRIAL
21	VS.	Pretrial	<b>February 24, 2025</b>
22	PATRICK M. BYRNE, an individual,	Conference: Time:	3:00 p.m.
23	Defendant.	Jury Trial	March 4, 2025
24	- Defendant.	Time:	9:00 a.m.
25		Judge: Hon Ste	ephen V. Wilson,
26		Ctrm. 10A	
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Pursuant to Fed. R. Civ. P. 16 and Local Rule 16-2.3, Plaintiff Robert Hunter Biden ("Plaintiff") and Defendant Patrick Byrne ("Defendant") set forth the following proposed exhibits for trial. Plaintiff and Defendant expressly reserve the right to further amend the Joint Trial Exhibit List to add documents obtained as a result of any additional discovery and as may be necessary for impeachment, rebuttal, or otherwise based upon the evidence adduced at trial.

Case Title: Robert Hunter Biden v. Patrick M. Byrne

Case No: 2:23-cv-09430-SVW-PD

9	Ex.	<u>Description</u>	<u>Date</u>	<u>Date</u>
10	<u>No.</u>		<b>Identified</b>	<u>Admitted</u>
11	1.	Capitol Times Magazine, Issue 1,		
12		published on June 27, 2023 (RHB00001-		
13		99)		
14	2.	Telegram post by Defendant Patrick Byrne		
15		on March 20, 2022, including associated		
16		comments (RHB00695)		
17	3.	Telegram post by Defendant Patrick Byrne		
18		on April 7, 2022, including associated		
19		comments (RHB00696)		
20	4.	Telegram post by Defendant Patrick Byrne		
21		on October 20, 2022 reposting post from		
22		Qtime Network, including associated		
23		comments (RHB00697)		
24	5.	Telegram post by Defendant Patrick Byrne		
25		on December 12, 2022, including		
26		associated comments (RHB00698)		
27	6.	X post by Defendant Patrick Byrne on		

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1	Ex.	<b>Description</b>	<u>Date</u>	<u>Date</u>
2	No.		Identified	Admitted
3		January 5, 2023, including associated		
4		comments (RHB00718)		
5	7.	X post by Defendant Patrick Byrne on		
6		January 7, 2023, including associated		
7		comments (RHB00721)		
8	8.	X post by Defendant Patrick Byrne on		
9		February 10, 2023, including associated		
10		comments (RHB00699)		
11	9.	X post by Defendant Patrick Byrne on		
12		February 12 2023, including associated		
13		comments (RHB00700)		
14	10.	X post by Defendant Patrick Byrne on		
15		February 24, 2023, including associated		
16		comments (RHB00701)		
17	11.	X post by Defendant Patrick Byrne on		
18		March 17, 2023, including associated		
19		comments (RHB00100, RHB00702)		
20	12.	X post by Defendant Patrick Byrne on		
21		March 28, 2023 (RHB00110, 150)		
22	13.	X post by Defendant Patrick Byrne on		
23		April 17, 2023, including associated		
24		comments (RHB00716)		
25	14.	X post by Defendant Patrick Byrne on		
26		May 10, 2023, including associated		
27		comments (RHB00720)		
28	1			

$_{1}\Vert$	Ex.	Description	Date	<b>Date</b>
$_{2}\Vert$	No.	<u> </u>	<b>Identified</b>	Admitted
3	15.	Screenshot of link to Defendant Patrick		
4		Byrne's May 10, 2023 interview on <i>The</i>		
5		Absolute Truth with Emerald Robinson		
6		(RHB00186)		
7	16.	Screenshot of link to Defendant Patrick		
8		Byrne's May 11, 2023 interview on The		
9		Absolute Truth with Emerald Robinson		
10		(RHB00187)		
11	17.	Transcript of Defendant Patrick Byrne's		
12		May 11, 2023 interview on The Absolute		
13		Truth with Emerald Robinson		
14		(RHB00711-RHB00715)		
15	18.	X post by Defendant Patrick Byrne on		
16		May 12, 2023, including associated		
17		comments (RHB00101, 104)		
18	19.	X post by Defendant Patrick Byrne on		
19		May 12, 2023, including associated		
20		comments (RHB00102-103, 112-117,		
21		119)		
22	20.	Telegram post by Defendant Patrick Byrne		
23		on June 24, 2023, including associated		
24		comments (RHB00703)		
25	21.	X post by Defendant Patrick Byrne on		
		June 25, 2023, including associated		
		comments (RHB00719)		
<ul><li>26</li><li>27</li><li>28</li></ul>				

1	Ex.	<b>Description</b>	<u>Date</u>	<u>Date</u>
2	<u>No.</u>	<u>Description</u>	<u>Identified</u>	Admitted
3	22.	Telegram post by Defendant Patrick Byrne		
4		on June 27, 2023, including associated		
5		comments (RHB00151-152)		
6	23.	Telegram post by Defendant Patrick Byrne		
7		on June 27, 2023, including associated		
8		comments (RHB00153-155)		
9	24.	Telegram post by Defendant Patrick Byrne		
10		on June 28, 2023, including associated		
11		comments (RHB00157)		
12	25.	X post by Defendant Patrick Byrne on		
13		June 29, 2023, including associated		
14		comments (RHB00105-106)		
15	26.	Telegram posts by Defendant Patrick		
16		Byrne on July 4, 2023, including		
17		associated comments (RHB00156)		
18	27.	Telegram post by Defendant Patrick Byrne		
19		on July 5, 2023, including associated		
20		comments (RHB00158-161)		
21	28.	Telegram post by Defendant Patrick Byrne		
22		on July 6, 2023, including associated		
23		comments (RHB00162)		
24	29.	Telegram post by Defendant Patrick Byrne		
25		on July 21, 2023, including associated		
26		comments (RHB00163-164)		
27	30.	Screenshot of link to Defendant Patrick		
28	-			

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1	Ex.	<u>Description</u>	<u>Date</u>	<u>Date</u>
2	No.		<b>Identified</b>	<b>Admitted</b>
3		Byrne's July 21, 2023 interview with Alex		
4		Jones on The Alex Jones Show		
5		(RHB00185)		
6	31.	Transcript of Defendant Patrick Byrne's		
7		July 21, 2023 interview with Alex Jones		
8		on The Alex Jones Show (RHB00722-		
9		RHB00789)		
10	32.	Telegram post by Defendant Patrick Byrne		
11		on July 22, 2023, including associated		
12		comments (RHB00167)		
13	33.	Telegram post by Defendant Patrick Byrne		
14		on July 28, 2023, including associated		
15		comments (RHB00168)		
16	34.	Screenshot of link to Defendant Patrick		
17		Byrne's September 8, 2023 interview on		
18		The Courtenay Turner Podcast, Episode		
19		305: Behind the Testimony of America's		
20		#1 Domestic Extremist w/ Patrick Byrne		
21		(RHB00184)		
22	35.	Transcript of Defendant Patrick Byrne's		
23		September 8, 2023 interview on The		
24		Courtenay Turner Podcast, Episode 305:		
25		Behind the Testimony of America's #1		
26		Domestic Extremist w/ Patrick Byrne		
27		(RHB00790-RHB00846)		
28				

1	Ex.	Description	<b>Date</b>	<u>Date</u>
2	No.		Identified	Admitted
3	36.	Telegram post by Defendant Patrick Byrne		
4		on September 17, 2023, including		
5		associated comments (RHB00169)		
6	37.	X post by Defendant Patrick Byrne on		
7		October 8, 2023 (RHB00147; Pg. 3 of		
8		Exhibit B to Plaintiff's Complaint)		
9	38.	X post by Defendant Patrick Byrne on		
10		October 8, 2023, including associated		
11		comments (RHB00146; Pg. 2 of Exhibit B		
12		to Plaintiff's Complaint)		
13	39.	X post by Rep. Eric Swalwell on October		
14		8, 2023, including associated comments		
15		(RHB00143-145)		
16	40.	X post by @AzPinkLady on October 11,		
17		2023, including associated comments		
18		(RHB00125-126)		
19	41.	X post by @AzPinkLady on October 11,		
20		2023, including associated comments		
21		(RHB00128)		
22	42.	X post by Defendant Patrick Byrne on		
23		October 17, 2023, including associated		
24		comments (RHB00141-142)		
25	43.	X post by Defendant Patrick Byrne on		
26		October 17, 2023, including associated		
27		comments (RHB00148)		
28	L			



1	Ex.	Description	<u>Date</u>	<u>Date</u>
2	<u>No.</u>	<u> </u>	<u>Identified</u>	Admitted
3	44.	X post by Defendant Patrick Byrne on		
4		October 23, 2023, including associated		
5		comments (RHB00109)		
6	45.	October 26, 2023 Demand for Retraction		
7		Letter to Defendant Patrick Byrne, sent by		
8		Plaintiff's counsel of record (RHB00404-		
9		406)		
10	46.	X post by Defendant Patrick Byrne on		
11		November 9, 2023, including associated		
12		comments (RHB00124, 149)		
13	47.	X post by Defendant Patrick Byrne on		
14		November 9, 2023, including associated		
15		comments (RHB00102-103, 112-117,		
16		119)		
17	48.	Truth Social post by @RickRichGuillot on		
18		November 9, 2023, including associated		
19		comments (RHB00171)		
20	49.	X post by Defendant Patrick Byrne on		
21		November 10, 2023, including associated		
22		comments (RHB00118, 137)		
23	50.	X post by Defendant Patrick Byrne on		
24		November 13, 2023, including associated		
25		comments (RHB00108, 132)		
26	51.	Screenshot of link to Defendant Patrick		
27		Byrne's November 13, 2023 interview		
28	-	L. L.		

1	<u>Ex.</u>	<u>Description</u>	<u>Date</u>	<u>Date</u>
2	<u>No.</u>		<b>Identified</b>	<b>Admitted</b>
3		with Roger Stone on his podcast The		
4		StoneZONE with Roger Stone, titled "Sued		
5		by Hunter Biden Former Overstock CEO		
6		Patrick Byrne Enters the StoneZONE"		
7		(RHB00183)		
8	52.	Transcript of Defendant Patrick Byrne's		
9		November 13, 2023 interview with Roger		
10		Stone on his podcast <i>The StoneZONE with</i>		
11		Roger Stone, titled "Sued by Hunter Biden		
12		Former Overstock CEO Patrick Byrne		
13		Enters the StoneZONE" (RHB00847-		
14		RHB00864)		
15	53.	X post by @AzPinkLady on November		
16		14, 2023, including associated comments		
17		(RHB00129-131)		
18	54.	Telegram post by Defendant Patrick Byrne		
19		on December 5, 2023, including		
20		associated comments (RHB00166)		
21	55.	Transcript from George Berges' January 9,		
22		2024 Congressional Transcribed Interview		
23		with the House Committee on Oversight		
24		and Accountability and House Committee		
25		on the Judiciary (RHB00266-403)		
26	56.	January 9, 2024 Letter to Rep James		
27		Comer, Chairman of the House Committee		
28				

1	Ex.	<u>Description</u>	<u>Date</u>	<u>Date</u>
2	No.		<b>Identified</b>	<b>Admitted</b>
3		on Oversight and Accountability, and Rep.		
4		Jim Jordan, Chairman of the House		
5		Committee on the Judiciary, from William		
6		Pittard, counsel for George Berges		
7		(RHB00407-410)		
8	57.	X post by @AzPinkLady on January 11,		
9		2024 (RHB00134)		
10	58.	X post by @AzPinkLady on January 11,		
11		2024 (RHB00135)		
12	59.	X post by Senator mark Kelly on January		
13		11, 2024, including associated comments		
14		(RHB00136)		
15	60.	Telegram post by Scott Adams on		
16		February 4, 2024, including associated		
17		comments (RHB00165)		
18	61.	Truth Social post by Defendant Patrick		
19		Byrne on February 13, 2024, including		
20		associated comments (RHB00170)		
21	62.	Truth Social post by Defendant Patrick		
22		Byrne on February 22, 2024, including		
23		associated comments (RHB00172)		
24	63.	Text Thread between Defendant Patrick		
25		Byrne and Anil Anwar between March 16,		
26		2024 to April 16, 2024 (Byrne_0000021)		
27	64.	April 1, 2024 Affidavit of John Moynihan		
28				

1	Ex.	<u>Description</u>	<b>Date</b>	<b>Date</b>
2	<u>No.</u>		<b>Identified</b>	Admitted
3		(Byrne_000001-3)		
4	65.	X post by Defendant Patrick Byrne on		
5		April 8, 2024, including associated		
6		comments (RHB00717)		
7	66.	X post by Defendant Patrick Byrne on		
8		April 25, 2024 (RHB00107)		
9	67.	X post by @AzPinkLady on April 25,		
10		2024, including associated comments		
11		(RHB00127)		
12	68.	Telegram post by Defendant Patrick Byrne		
13		on June 5, 2024, including associated		
14		comments (RHB00704)		
15	69.	X post by @AzPinkLady on June 30, 2024		
16		(RHB00133)		
17	70.	X post by Defendant Patrick Byrne on July		
18		22, 2024, including associated comments		
19		(RHB00138-140)		
20	71.	August 9, 2024, Defendant Patrick		
21		Byrne's verified Further Responses to		
22		Plaintiff's Interrogatories, Set One		
23	72.	September 5, 2024, Defendant Patrick		
24		Byrne's Responses to Plaintiff's		
25		Interrogatories, Set Two		
26	73.	September 5, 2024, Defendant Patrick		
27		Byrne's Responses to Plaintiff's		
28		<u>.</u>		

1	Ex.	<u>Description</u>	<b>Date</b>	<u>Date</u>
2	No.		<b>Identified</b>	<b>Admitted</b>
3		Interrogatories, Set Three		
4	74.	September 9, 2024, emails between		
5		Plaintiff's counsel of record and Jared		
6		Roberts, attorney for Ret. Lt. Gen. Michael		
7		Flynn (RHB00506-508)		
8	75.	September 17, 2024, Defendant Patrick		
9		Byrne's Further Responses to Plaintiff's		
10		Requests for Production of Documents,		
11		Set One		
12	76.	September 19, 2024, Defendant Patrick		
13		Byrne's verified Further Responses to		
14		Plaintiff's Requests for Admissions, Set		
15		One		
16	77.	September 19, 2024, Defendant Patrick		
17		Byrne's Further Responses to Plaintiff's		
18		Requests Admissions, Set Two		
19	78.	September 19, 2024 Letter to Capitol		
20		Times Media LLC from Plaintiff's counsel		
21		of record (RHB00445-505)		
22	79.	Telegram post by Defendant Patrick Byrne		
23		on October 7, 2024, including associated		
24		comments (RHB00705)		
25	80.	October 10, 2024, Defendant Patrick		
26		Byrne's Further Responses to Plaintiff's		
27		Requests for Production of Documents,		
28	L			

1	Ex.	<b>Description</b>	<u>Date</u>	<u>Date</u>
2	No.		<b>Identified</b>	<b>Admitted</b>
3		Set Three		
4	81.	October 10, 2024, Defendant Patrick		
5		Byrne's Further Responses to Plaintiff's		
6		Requests for Production of Documents,		
7		Set Four		
8	82.	X post by Defendant Patrick Byrne on		
9		October 26, 2024, including associated		
10		comments (RHB00706)		
11	83.	October 29, 2024 Screenshot of Defendant		
12		Patrick Byrne's X Profile (RHB00707)		
13	84.	October 29, 2024 Screenshot of website		
14		enemywithindocuseries.com (RHB00708)		
15	85.	October 29, 2024 Screenshot of Defendant		
16		Patrick Byrne's book, The Deep Rig: How		
17		Election Fraud Cost Donal J. Trump the		
18		White House, By a Man Who did not Vote		
19		for Him: (or what to send friends who ask		
20		"Why do you doubt the integrity of		
21		Election 2020", for sale on Amazon.com		
22		(RHB00710)		
23	86.	October 29, 2024 Screenshot of Defendant		
24		Patrick Byrne's book, Danger Close:		
25		Domestic Extremist #1 Comes Clean, for		
26		sale on Amazon.com (RHB00709)		
27	87.	Defendant Patrick Byrne's book, Danger		
28	<u> </u>			

Ex.   Description   Date   Identified   No.	
Close: Domestic Extremist #1 Comes Clean, published on February 15, 2024 (RHB00509-RHB00694)  88. Truth Social post by @TXFreedom4Ever in 2023 (exact date unknown), including associated comments (RHB00173)  89. Truth Social post by @DEFCONMarine in 2023 (exact date unknown), including associated comments (RHB00178)  90. Truth Social post by @RealRogerStone in 2023 (exact date unknown), including associated comments (RHB00179)  91. Truth Social post by @AgnesBenko in 2023 (exact date unknown), including associated comments (RHB00180)	
Clean, published on February 15, 2024 (RHB00509-RHB00694)  88. Truth Social post by @TXFreedom4Ever in 2023 (exact date unknown), including associated comments (RHB00173)  89. Truth Social post by @DEFCONMarine in 2023 (exact date unknown), including associated comments (RHB00178)  90. Truth Social post by @RealRogerStone in 2023 (exact date unknown), including associated comments (RHB00179)  91. Truth Social post by @AgnesBenko in 2023 (exact date unknown), including associated comments (RHB00180)	
(RHB00509-RHB00694)  88. Truth Social post by @TXFreedom4Ever in 2023 (exact date unknown), including associated comments (RHB00173)  89. Truth Social post by @DEFCONMarine in 2023 (exact date unknown), including associated comments (RHB00178)  90. Truth Social post by @RealRogerStone in 2023 (exact date unknown), including associated comments (RHB00179)  91. Truth Social post by @AgnesBenko in 2023 (exact date unknown), including associated comments (RHB00180)	
in 2023 (exact date unknown), including associated comments (RHB00173)  89. Truth Social post by @DEFCONMarine in 2023 (exact date unknown), including associated comments (RHB00178)  90. Truth Social post by @RealRogerStone in 2023 (exact date unknown), including associated comments (RHB00179)  91. Truth Social post by @AgnesBenko in 2023 (exact date unknown), including associated comments (RHB00180)	
associated comments (RHB00173)  89. Truth Social post by @DEFCONMarine in 2023 (exact date unknown), including associated comments (RHB00178)  90. Truth Social post by @RealRogerStone in 2023 (exact date unknown), including associated comments (RHB00179)  91. Truth Social post by @AgnesBenko in 2023 (exact date unknown), including associated comments (RHB00180)	
89. Truth Social post by @DEFCONMarine in 2023 (exact date unknown), including associated comments (RHB00178)  90. Truth Social post by @RealRogerStone in 2023 (exact date unknown), including associated comments (RHB00179)  91. Truth Social post by @AgnesBenko in 2023 (exact date unknown), including associated comments (RHB00180)	
in 2023 (exact date unknown), including associated comments (RHB00178)  90. Truth Social post by @RealRogerStone in 2023 (exact date unknown), including associated comments (RHB00179)  91. Truth Social post by @AgnesBenko in 2023 (exact date unknown), including associated comments (RHB00180)	
associated comments (RHB00178)  90. Truth Social post by @RealRogerStone in 2023 (exact date unknown), including associated comments (RHB00179)  91. Truth Social post by @AgnesBenko in 2023 (exact date unknown), including associated comments (RHB00180)	
90. Truth Social post by @RealRogerStone in 2023 (exact date unknown), including associated comments (RHB00179)  91. Truth Social post by @AgnesBenko in 2023 (exact date unknown), including associated comments (RHB00180)	
2023 (exact date unknown), including associated comments (RHB00179)  91. Truth Social post by @AgnesBenko in 2023 (exact date unknown), including associated comments (RHB00180)	
associated comments (RHB00179)  91. Truth Social post by @AgnesBenko in 2023 (exact date unknown), including associated comments (RHB00180)	
91. Truth Social post by @AgnesBenko in 2023 (exact date unknown), including associated comments (RHB00180)	
2023 (exact date unknown), including associated comments (RHB00180)	
associated comments (RHB00180)	
10	
92. Truth Social post by @cziggy218 in 2023	
19 (exact date unknown), including	
20 associated comments (RHB00181)	
93. Truth Social post by @nancydunks in	
22 2023 (exact date unknown), including	
associated comments (RHB00182)	
94. Truth Social post by Defendant Patrick	
Byrne in 2024 (exact date unknown),	
including associated comments	
27 28 (RHB00174)	

1	Ex.	<b>Description</b>	<u>Date</u>	<u>Date</u>
2	No.		<b>Identified</b>	<b>Admitted</b>
3	95.	Truth Social post by Defendant Patrick		
4		Byrne in 2024 (exact date unknown),		
5		including associated comments		
6		(RHB00176)		
7	96.	Truth Social post by Defendant Patrick		
8		Byrne in 2024 (exact date unknown),		
9		including associated comments		
10		(RHB00170)		
11	97.	Truth Social post by Defendant Patrick		
12		Byrne in 2024 (exact date unknown),		
13		including associated comments		
14		(RHB00175)		
15	98.	Remittance Advance Invoice from Simon		
16		& Schuster UK Ltd., dated September 4,		
17		2021 (RHB00411)		
18	99.	Royalty Statements from Simon &		
19		Schuster from March 2020 through		
20		September 2024 (RHB00412-443)		
21	100	Royalty Ledger from Book/Lab Literary		
22		Agency (date unknown) (RHB00444)		
23	101	Hunter Biden Beautiful Things Press Kit		
24		(RHB00189-265)		
25	102	Audio Recording produced by Defendant		
26		in Discovery on August 27, 2024 titled		
27		"HIGHLY CONFIDENTIAL – AUDIO-		
28				

1	Ex.	<u>Description</u>	<u>Date</u>	<u>Date</u>
2	No.		<b>Identified</b>	<b>Admitted</b>
3		2021-08-15-10-07-25"		
4	103	Certified Transcript of Audio Recording		
5		produced by Defendant in Discovery on		
6		August 27, 2024 titled "HIGHLY		
7		CONFIDENTIAL – AUDIO-2021-08-15-		
8		10-07-25" (RHB01413-1414)		
9	104	Audio Recording produced by Defendant		
10		in Discovery on August 27, 2024 titled		
11		"HIGHLY CONFIDENTIAL – AUDIO-		
12		2021-08-24-08-46-17"		
13	105	Certified Transcript of Audio Recording		
14		produced by Defendant in Discovery on		
15		August 27, 2024 titled "HIGHLY		
16		CONFIDENTIAL – AUDIO-2021-08-24-		
17		08-46-17" (RHB01415-1416)		
18	106	Audio Recording produced by Defendant		
19		in Discovery on August 27, 2024 titled		
20		"HIGHLY CONFIDENTIAL – AUDIO-		
21		2021-08-24-14-43-38"		
22	107	Certified Transcript of Audio Recording		
23		produced by Defendant in Discovery on		
24		August 27, 2024 titled "HIGHLY		
25		CONFIDENTIAL – AUDIO-2021-08-24-		
26		14-43-38" (RHB01417-1418)		
27	108	Defendant's passport photographs		
28				

1	Ex.	<u>Description</u>	<u>Date</u>	<u>Date</u>
2	No.		<u>Identified</u>	<u>Admitted</u>
3		produced by Defendant in discovery on		
4		November 4, 2024 (Byrne_0000024-		
5		Byrne_0000045)		
6	109	Defendant's "medical notes" provided by		
7		Defendant via email on November 4, 2024		
8	110	Defendant's American Express recorded		
9		from July 2023, produced by Defendant in		
10		discovery on January 17, 2025 as		
11		(Byrne_0000046-Byrne_0000047)		
12	600.	Defendant Patrick Byrne's Notice of		
13		Taking of Deposition of Plaintiff Robert		
14		Hunter Biden (Deposition of Robert		
15		Hunter Biden taken on 08/16/2024)		
16	601.	Plaintiff's Objections to Defendant's		
17		Amended Notice of Deposition of Plaintiff		
18		Robert Hunter Biden (Deposition of		
19		Robert Hunter Biden taken on 08/16/2024)		
20	602.	Plaintiff Robert Hunter Biden's Rule 26		
21		Supplemental Disclosures (Deposition of		
22		Robert Hunter Biden taken on		
23		08/16/2024)		
24	603.	Plaintiff Robert Hunter Biden's		
25		Responses to Defendant Patrick M.		
26		Byrne's First Set of Interrogatories		
27				

1	Ex.	Description	<u>Date</u>	<u>Date</u>
2	No.	<u>= 5333-<b>p</b></u> 3353 <u>-</u>	<u> </u>	Admitted
3		(Deposition of Robert Hunter Biden taken		
4		on 08/16/2024)		
5	604.	Stipulation for Protective Order and		
6		Order (Deposition of Robert Hunter		
7		Biden taken on 08/16/2024)		
8	605.	Complaint for Damages for Defamation		
9		(Deposition of Robert Hunter Biden taken		
10		on 08/16/2024)		
11	606.	Affidavit dated April 1, 2024 (Deposition		
12		of Robert Hunter Biden taken on		
13		08/16/2024)		
14	607.	U.S. Senate Committee on Finance		
15		Majority Staff Report (Deposition of		
16		Robert Hunter Biden taken on		
17		08/16/2024)		
18	608.	The Government's Motions In Limine		
19		(Deposition of Robert Hunter Biden taken		
20		on 08/16/2024)		
21	609.	New York Post article entitled Smoking-		
22		gun email reveals how Hunter Biden		
23		introduced Ukrainian businessman to VP		
24		dad (Deposition of Robert Hunter Biden		
25		taken on 08/16/2024)		
26	610.	Independent article entitled Not many		
27		people are buying Hunter Biden's new		
28	1			

1	Ex.	<b>Description</b>	<u>Date</u>	<b>Date</b>
2	No.		<b>Identified</b>	<b>Admitted</b>
3		book (Deposition of Robert Hunter Biden		
4		taken on 08/16/2024)		
5	611.	New York Post article entitled Hunter		
6		Biden's drug- and sex-fueled memoir is a		
7		big fat flop (Deposition of Robert Hunter		
8		Biden taken on 08/16/2024)		
9	612.	Screenshot of an Amazon page for the		
10		book Laptop from Hell: Hunter Biden,		
11		Big Tech, and the Dirty Secrets the		
12		President Tried to Hide (Deposition of		
13		Robert Hunter Biden taken on		
14		08/16/2024)		
15	613.	National Security article entitled Analysis		
16		of Hunter Biden's hard drive show he, his		
17		firm took in about \$11 million from 2013		
18		to 2018, spent it fast (Deposition of		
19		Robert Hunter Biden taken on		
20		08/16/2024)		
21	614.	Article entitled The Sordid Saga of		
22		Hunter Biden's Laptop (Deposition of		
23		Robert Hunter Biden taken on		
24		08/16/2024)		
25	615.	Article entitled Republican Claims About		
26		Hunter Biden Offenses (Deposition of		
27		1		

1	Ex.	Description	<b>Date</b>	<b>Date</b>
2	No.		Identified	Admitted
3		Robert Hunter Biden taken on		
4		08/16/2024)		
5	616.	The Irish Times article entitled Hunter		
6		Biden, the 'big guy' and whether		
7		allegations of corruption represent a		
8		scandal or a smear (Deposition of Robert		
9		Hunter Biden taken on 08/16/2024)		
10	617.	CBC News article entitled The scandals		
11		swirling around Hunter Biden - what we		
12		know, what we don't, and what's next		
13		(Deposition of Robert Hunter Biden taken		
14		on 08/16/2024)		
15	618.	Press Release entitled Comer, Greene		
16		Renew Request to DOJ on Mishandling		
17		of Hunter Biden Victims' Rights		
18		(Deposition of Robert Hunter Biden taken		
19		on 08/16/2024)		
20	619.	Article entitled Hunter Biden's universe		
21		of legal problems, briefly explained		
22		(Deposition of Robert Hunter Biden taken		
23		on 08/16/2024)		
24	620.	Indictment for Case No. 23-00061-MN		
25		(Deposition of Robert Hunter Biden taken		
26		on 08/16/2024)		
27	L			

1	Ex.	Description	<u>Date</u>	<u>Date</u>
2	No.	Description	<u> </u>	Admitted
3	621.	New York Post article entitled Biden has	<u>ruchtificu</u>	Admitted
	021.			
4		a secret, illegal deal with Iran that gives		
5		mullahs everything they want (Deposition		
6		of Robert Hunter Biden taken on		
7		08/16/2024)		
8	622.	Fox News article entitled Hunter Biden		
9		took thousands from daughter's college		
10		fund for 'hookers and drugs': report		
11		(Deposition of Robert Hunter Biden taken		
12		on 08/16/2024)		
13	623.	Indictment for Case No. 2:23-cr-00599-		
14		MCS (Deposition of Robert Hunter Biden		
15		taken on 08/16/2024)		
16	624.	National Review article entitled The		
17		Indefensible, Shameless, Sordid Hunter		
18		Biden (Deposition of Robert Hunter		
19		Biden taken on 08/16/2024)		
20	625.	CNN Politics article entitled Hunter		
21		Biden's universe of legal problems,		
22		briefly explained (Deposition of Robert		
23		Hunter Biden taken on 08/16/2024)		
24	626.	The New York Times article entitled A		
25		Timeline of Hunter Biden's Life and		
26		Legal Troubles (Deposition of Robert		
27		Hunter Biden taken on 08/16/2024)		
28				

1	Ex.	<b>Description</b>	<b>Date</b>	<u>Date</u>
2	No.		<b>Identified</b>	<b>Admitted</b>
3	627.	Marco Polo file BidenLaptopMedia.com		
4		(Deposition of Robert Hunter Biden taken		
5		on 08/16/2024)		
6	628.	Marco Polo Report on the Biden Laptop		
7		(Deposition of Robert Hunter Biden taken		
8		on 08/16/2024)		
9	629.	Defendant's Document Production		
10		(Byrne_000001-Byrne_000009) served		
11		on 08/27/2024		
12	630.	Defendant's Document Production		
13		(Byrne_000010-Byrne_000020) served		
14		on 10/15/2024		
15	631.	Defendant's Document Production		
16		(Byrne_000021) served on 10/15/2024		
17	632.	Defendant's Document Production		
18		(Byrne_000022-Byrne_000023) served		
19		on 10/16/2024		
20	633	Passport Pages for Byrne (Byrne 24 to		
21		25)		
22	634	Tapes 2021		
23				
24	635	Affidavit of Moynihan (Byrne 1-3)		
25				
26	635	Byrne Amex Travel Documents (Byrne		
27		10-20)		
28				

1	Ex.	Description	<u>Date</u>	<u>Date</u>
2	No.		Identified	Admitted
3	636	Assistant Secretary of State Letter		
4		8/26/11 (Byrne 4)		
5	637	Airline Itinerary Documents (Byrne 7-9)		
6				
7	638	Complaint in Biden v. Ziegler Case No.:		
8		2.23-cv-07591 (Rule 26f Disc 9/30/24)		
9	639	Complaint in Biden v. Giuliana Case No.:		
10		2.23-cv-8032 (Rule 26f Disc 9/30/24		
11	640	Complaint Issac v. Biden Case No.:		
12		822C-10-012-CAK (Rule 26f Disc		
13		9/30/24)		
14	641	US Senate Report on Corruption (Exh		
15		620 Biden Deposition) Rule 26f Disc		
16		9/30/24		
17	642	Motions in Limine Patrick Ho Case (Exh		
18		621 Biden Deposition) Rule 26f Discl		
19		9/30/24		
20	643	Book Laptop from Hell by Miranda		
21		Devine; Rule 26f Discl 9/30/24		
22	644	Gun Case Indictment- Exh 633 to Biden		
23		Deposition; Rule 26f Disc 9/30/24		
24	645	Tax Case Indictment -Exh 638 to Biden		
25		Deposition; Rule 26f Disc 9/30/24		
26	646	Jury Verdict Gun Case; Rule 26f Discl		
27		9/3024		
28		<u> </u>		

1	Ex.	<u>Description</u>	<u>Date</u>	<u>Date</u>
2	No.		<b>Identified</b>	<b>Admitted</b>
3	647	Dr. Nathan E. Lavin MD Report dated		
4		October 29, 2024, produced to plaintiff's		
5		counsel per stipulation and order for IME;		
6		Rule 26f Discl 9/30/24		
7	648	Report on The Biden Laptop published by		
8		Marco Polo; Rule 26f Discl 9/30/24		
9	649	Patrick Ho Sanction; Rule 26f Discl		
10		9/30/24		
11	650	Article: Hunter Biden took Daughter's		
12		College Money-Exh 635 to Biden		
13		Deposition; Rule 26f Discl 9/30/24		
14	651	Article on Hunter Biden's Lawsuit; Rule		
15		26f Disc 9/30/24		
16	652	Article on Hunter Biden Art Sales; Rule		
17		26f Discl dated 9/30/24		
18	653	Press Kit-Exh 609 to Deposition of		
19		Biden; Rule 26f Discl 9/30/24		
20	654	Press Kit-Exh 610 to Biden Deposition;		
21		Rule 26f Discl 9/3024		
22	655	Podcasts-Exh 611 to Biden Deposition;		
23		Rule 26f Discl 9/30/24		
24	656	International Press-Exh 612 to Biden		
25		Deposition; Rule 26f Discl 9/30/24		
26	657	NY Post Article on Burisma; Exh 622 to		
27		Biden Deposition; Rule 26f Discl 9/30/24		
28	L	1		

1	Ex.	Description	<b>Date</b>	Date
2	No.		<u> </u>	<u>Admitted</u>
3	658	Article on Biden's book sales; Exh 623 to		
4		Biden Deposition; Rule 26f Discl 9/30/24		
5	659	Article on Biden's Book; Exh 624 Biden		
6		Deposition; Rule 26f Discl 9/30/24		
7	660	Laptop from Hell Screen Shot; Exh 625		
8		to Biden Deposition; Rule 26f Discl		
9		9/30/24		
10	661	Analysis of Biden laptop and payments;		
11		Exh 626 to Biden Deposition; Rule 26f		
12		Discl 9/30/24		
13	662	Biden Laptop Article, Exh. 627 to Biden		
14		Deposition; Rule 26f Discl. 9/30/24		
15	663	Scandal Article; Exh 629 to Biden		
16		Deposition; Rule 26f Dlscl 9/30/24		
17	664	Scandal Article; Exh 630 to Biden		
18		Deposition; Rule 26f Discl 9/30/24		
19	665	Article on Biden's Legal Problems; Exh		
20		632 to Biden Deposition; Rule 26f		
21		Disclosure		
22	666	Article on Shameless Biden; Exh. 639 to		
23		Biden Deposition; Rule 26f Discl 9/30/24		
24	667	Article on Biden Legal Problems; Exh.		
25		640 to Biden Deposition; Rule 26f Discl		
26		9/30/24		
27		<u>l</u>		

		<u>Date</u>
	<b>Identified</b>	<b>Admitted</b>
Marco Polo Pub on Biden File; Rule 26		
Discl 9/30/24		
Marco Polo Report on Biden; Exh 654 to		
Biden Deposition; Rule 26f Discl 9/30/24		
Article on Biden Law License		
Suspended; Rule 26f Discl 9/30/24		
Article on Romanian Influence Peddling		
by Biden; Rule 26f Discl 9/30/24		
	Discl 9/30/24  Marco Polo Report on Biden; Exh 654 to Biden Deposition; Rule 26f Discl 9/30/24  Article on Biden Law License Suspended; Rule 26f Discl 9/30/24  Article on Romanian Influence Peddling	Marco Polo Pub on Biden File; Rule 26 Discl 9/30/24  Marco Polo Report on Biden; Exh 654 to Biden Deposition; Rule 26f Discl 9/30/24  Article on Biden Law License Suspended; Rule 26f Discl 9/30/24  Article on Romanian Influence Peddling

The Parties reserve the right to request that the court permit the List of Exhibits to be amended to allow for additional exhibits to be included in the list pursuant to Federal Rule of Civil Procedure Section 16(e). The Parties also reserve pursuant to the right to pursuant to Federal Rule of Civil Procedure 16-2.3 to use impeachment exhibits that are not included on the Joint Exhibit List during the trial of this case. The parties have not stipulated to the authenticity or admissibility of these trial exhibits as of the filing of this Joint Exhibit List.

Dated: February 13, 2025 EARLY SULLIVAN WRIGHT GIZER & MCRAE LLP

By: /s/ Zachary C. Hansen

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14	Attorneys for Plaintiff Robert Hunter Biden
15	Dated: February 13, 2025 LAW OFFICES OF MICHAEL C. MURPHY
16	Dated. Teordary 13, 2023 EAW OFFICES OF WHEHALE C. WORTH
17	
18	By: /s/ Michael C. Murphy
19	Michael C. Murphy, Esq.
20	Michael C. Murphy, Jr., Esq.
21	Attorneys for Defendant
22	Patrick Byrne
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